



**{In Archive} FYI: WM's reply re: Near-term storm preparation at WGS** 

**Stephen Tyahla** to: lene.ichinotsubo, Bret Moxley, Ellen Blake,  
Steve Armann, steven.chang

02/07/2011 09:24 AM

Cc: David Wampler, Arlene Kabei, stuart.yamada, Tom Huetteman, Rich  
Vaille

Bcc: Dean Higuchi

Archive: This message is being viewed in an archive.

FYI.

Late Friday, Joe Whelan responded to my below e-mail (his reply attached), and his responses were satisfactory for our near-term concerns.

btw, Joe was a bit delayed getting his response out as the mayor of Honolulu visited the site that afternoon, with little notice--seems the visit went well.

After getting his responses late Friday, I spoke with Joe. That conversation further reassured me they are seriously addressing the items in our Order and are as prepared as they can be for a significant storm. Most importantly, while they are not quite ready to claim the diversion structure as "functional," as of end of Friday, the U ditch and 78-inch diameter pipe are in an alignment to provide significant channeling of storm water around the upper portion of the landfill--I think that's huge. The Order deadline for them to have it functional is 15 Feb; a date they should easily meet.

Additionally, WM has met every deadline on submittals and they are generally in good shape. We'll reply this week to the ones they submitted 1 Feb. Also, I'll be sending Joe a deliverables tracking spreadsheet today to help he and I track them, including our reviews, etc.

Bottom line from my perspective at this point is I don't see any real emergency from significant storms, they've been responsive to the Order and taking appropriate actions in preparation for future rain (especially their pace of getting that diversion structure functional).

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2011-02-04\_WM Response re Near-term storm prep.pdf

Stephen Tyahla

Joe, We are reviewing the submittals you provid...

02/04/2011 11:41:28 AM

From: Stephen Tyahla/R9/USEPA/US  
To: jwhelan1@wm.com  
Cc: Bret Moxley/R9/USEPA/US@EPA, lene.ichinotsubo@doh.hawaii.gov, Steve  
Armann/R9/USEPA/US@EPA, steven.chang@doh.hawaii.gov, stuart.yamada@doh.hawaii.gov,  
David Wampler/R9/USEPA/US@EPA, Ellen Blake/R9/USEPA/US@EPA, Arlene  
Kabei/R9/USEPA/US@EPA  
Date: 02/04/2011 11:41 AM

Subject: Near-term storm preparation at WGSL

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Joe,

We are reviewing the submittals you provided on 1 February 2011 in response to our Administrative Order on Consent ("AOC") and our 28 January 2011 e-mail that conditionally approved re-opening of cell E6 at the Waimanalo Gulch Sanitary Landfill ("WGSL"). I anticipate sending you our detailed feedback on those work plans and schedules by the latter part of next week.

However, in light of "heavy rain" being forecasted by NOAA for the vicinity of the WGSL this coming weekend, we are providing the below interim comments on your "[Revised Storm Water Management Update & Contingency Plan](#)," ("contingency plan") and would like your written response to these today. These particular comments generally concern near-term preparation for storm events and are either items that lack detail or are absent in the contingency plan Waste Management of Hawaii ("WMH") submitted on 1 February.

- (1) Please provide details on WMH's process for deciding when Cell E6 operations are to be shut-down due to rain storm events and how such a shut-down would be executed.
- (2) Please provide a description of how WMH would secure waste within Cell E6 in anticipation of a significant rain event.
- (3) Please inform us of the status (e.g., flanged or otherwise shut and secured) of the 36-inch diameter fiberglass manhole that connects to the 78-inch Hobas pipe, that is located just upstream of the temporary earthen berm that is directly downstream of Cell E6.
- (4) The contingency plan states, under item 5), that "The sedimentation basin, temporary berm in the Cell E6 area, 36 inch storm water diversion piping, and general facility drainage ditches will be monitored and maintained during potential storm events." Please describe the type and frequency of monitoring that will be performed, who will perform the monitoring, including after normal work hours (WMH's security service?).

I will give you a call in approximately an hour to discuss, but feel free to call me sooner.

We appreciate your cooperation.

Stephen F. Tyahla, P.E., CHMM  
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RE: Near-term storm preparation at WGS  
 Whelan, Joseph  
 to:  
 Stephen Tyahla  
 02/04/2011 04:51 PM  
 Show Details

History: This message has been replied to.  
 Greetings Steve.

Please find our responses to your referenced request.

Best regards,

Joe

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**From:** Tyahla.Stephen@epamail.epa.gov [mailto:Tyahla.Stephen@epamail.epa.gov]  
**Sent:** Friday, February 04, 2011 9:41 AM  
**To:** Whelan, Joseph  
**Cc:** Moxley.Bret@epamail.epa.gov; lene.ichinotsubo@doh.hawaii.gov; Armann.Steve@epamail.epa.gov; steven.chang@doh.hawaii.gov; stuart.yamada@doh.hawaii.gov; Wampler.David@epamail.epa.gov; Blake.Ellen@epamail.epa.gov; Kabei.Arlene@epamail.epa.gov  
**Subject:** Near-term storm preparation at WGS

Joe,

We are reviewing the submittals you provided on 1 February 2011 in response to our Administrative Order on Consent ("AOC") and our 28 January 2011 e-mail that conditionally approved re-opening of cell E6 at the Waimanalo Gulch Sanitary Landfill ("WGS"). I anticipate sending you our detailed feedback on those work plans and schedules by the latter part of next week.

However, in light of "heavy rain" being forecasted by NOAA for the vicinity of the WGS this coming weekend, we are providing the below interim comments on your "[Revised Storm Water Management Update & Contingency Plan](#)," ("contingency plan") and would like your written response to these today. These particular comments generally concern near-term preparation for storm events and are either items that lack detail or are absent in the contingency plan Waste Management of Hawaii ("WMH") submitted on 1 February.

- (1) Please provide details on WMH's process for deciding when Cell E6 operations are to be shut-down due to rain storm events and how such a shut-down would be executed. [\[Whelan, Joe\]](#) The facility is currently closed to the public, which means our daily volumes are fairly small. Our normal procedures call for us to stop operations if rainfall amounts create either a safety, environmental or operations concern. If unloading or processing operations are severely affected, we would suspend operations, and begin covering the waste material placed that day. As you know, we only create a working face disposal area large enough to accept the predicted days waste receipts. Therefore, this area is very small now until we reopen to the public. Once operations are ceased, we will place daily cover over all exposed waste. This cover would meet interim cover requirements, which is one foot of soil, which is compacted after placement.
- (2) Please provide a description of how WMH would secure waste within Cell E6 in anticipation of a significant rain event. [\[Whelan, Joe\]](#) We have already evaluated and reinforced the existing DI-1 interceptor manhole by placing a mound of large boulders in front of this manhole to prevent silt from washing over and covering the opening. Additionally, we have increased the height and breadth of the berm placed

below this manhole in an effort to create a damned area in order to keep it from clogging with silt. Today we are also constructing a second berm located just above the northern leading edge of Cell E6 in order to dam up any water that fell in this area, and prevent it from entering Cell E6. This berm is slightly angled to divert water towards the northwest, so that in the event that this new berm over topped, storm water would be diverted into the previous Cell E6 lake area, but around any exist waste material. This berm would also be covered with liner material in order to prevent any breakthroughs.

(3) Please inform us of the status (e.g., flanged or otherwise shut and secured) of the 36-inch diameter fiberglass manhole that connects to the 78-inch Hobas pipe, that is located just upstream of the temporary earthen berm that is directly downstream of Cell E6. *[Whelan, Joe]* This manhole is flanged off and covered by several feet of road base material, and not accessible to any storm water.

(4) The contingency plan states, under item 5), that "The sedimentation basin, temporary berm in the Cell E6 area, 36 inch storm water diversion piping, and general facility drainage ditches will be monitored and maintained during potential storm events." Please describe the type and frequency of monitoring that will be performed, who will perform the monitoring, including after normal work hours (WMH's security service?). *[Whelan, Joe]* Waste Management and contractor employees are on site performing normal duties from approximately 6:00AM thru 7:00PM daily. We have a 24 hour 7 day per week security service who are trained to phone WM on call personnel in the event that a storm event hits the facility. Our employees would then provide an assessment of current conditions.

I will give you a call in approximately an hour to discuss, but feel free to call me sooner.

We appreciate your cooperation.

Stephen F. Tyahla, P.E.,CHMM  
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